

Before the
Federal Communications Commission
Washington, D. C. 20554

In the Matter Of)
Digital Audio Broadcast Systems)
and their Impact on the) MM Docket No. 99-325
Terrestrial Radio Broadcast)
Service)

Comments of Robert L. Foxworth

I am a private citizen who has a strong interest in the development and preservation of AM radio broadcasting in the United States. I have approximately 25 years experience in working in the broadcasting industry and have held Commercial First 'Phone licenses (when they were blue, then orange) and Commercial 2nd Telegraph, as well as Extra class Amateur license.

My comments are applicable to AM broadcasting only. I believe some issues relative to AM and FM are sufficiently different, that they should have been partitioned in some manner, mainly in that night time interference issues for AM do not relate to FM, and that I believe audiences for secondary programming channels would be better served on FM.

My comments are made as a listener and consumer of locally delivered AM radio, and as a member of the audience for locally delivered AM radio product. This product as it exists today, from a technical standpoint, meets my expectations and needs. While I have extensive experience with reception of distant night AM signals, I do not wish to address that point, with the exception of "national security" below.

Kindly permit me to state first, that I am opposed to the concept of night time AM use of IBOC technology. I believe there are technically sound, compelling reasons why AM IBOC usage is a bad idea, and they have been cogently stated by other responders, better and more exactly than I could do, so I therefore endorse those comments. Similarly, the case why night AM IBOC would also violate the Commission's existing rules has also been made.

I believe the Commission has an obligation to further address these issues and develop solutions before pushing ahead blindly with adoption of night service with the handicaps that have already been demonstrated.

I would urge the Commission to examine, and conduct field tests on other systems such as CAM-D to determine their suitability. (Note: I do not know or work with any of the principals of, or companies, involved in these proceedings, nor do I have any financial or other interest in any of them, whether manufacturer or broadcaster).

I am not opposed to the concept of adopting digital broadcast technology to AM type of service, but I believe that the service should be done on a different frequency band to natively allow use of high bandwidth technology, so we would be in agreement with the rest of the world (e.g. Eureka, which is itself getting off to a slow start).

I submit that in many cases, adoption and deployment of IBOC has been restrained because many potential early adopters see little value in spending the capital needed for adoption, in the face of massive public lack of awareness, lack of interest and reluctance to spend the money needed to acquire new receivers. What the public wants is programming that will capture their interest and meet their needs. I believe this is done with local, full-service radio which is independent of technical gimmickry. At this point, content becomes the issue, and slight improvements (relatively) to the delivery mechanism, for the local audience, lose relevance. This means the broadcaster has to improve his content.

There is the national security issue of dependable, wide coverage night time AM radio available to listeners in emergency conditions. which I believe would be unavailable in an all-IBOC setting. If for no other reason, the Commission owes it to the American people to retain this capability, especially in the current environment of being faced with terrorist attack on a wide scale, from overseas groups who, for the first time, have the means, will and capability of delivering harm on a wide scale to this country. It is unclear to me as to how DHS could ever sign - off on this concept. The power blackout of 14 August 2003 is a guideline, when many depended on night skywave from distant clears for information.

The concept of the Commission addressing interference complaints on an ad-hoc, individual basis, I believe is a palliative, as I believe what would happen is that the recipient of interference would just have to suffer, as there is no practical cure in reality, short of ceasing to transmit IBOC, and that cure is more readily made by not starting it in the first place.

If the Commission determines that IBOC is appropriate for AM, then it would be logical to allow all stations to run similar amounts of power, e.g 100 to 5000 watts (since the broadcasters are all claiming that they just care about their local service area). The idea of stations trying to run IBOC with 5 or 10 watts at night, which is foolish, would then not exist. Then, assuming that stations truly want to serve just their local area, the headaches of trying to run IBOC through highly reactive, sharply tuned DA systems would be fixed by letting everyone use broadband, non-directional monopoles. The NIF contours will radically shrink, but I think we have the evidence today that they will do so anyway, a consideration unknown to many small broadcasters who believe their coverage will actually improve with IBOC, having confused signal quality with signal coverage.

The disturbing aspect of this situation is that, in the face of the problems that have been demonstrated, there is a "rush" to adopt this questionable technology before all the issues have been looked at and before the other solutions have been properly evaluated, and this is before even mentioning the really bad idea of letting a single license provider (manufacturer of the encoding equipment) have free rein to set changed licensing issues in the future. This gives the APPEARANCE

to outsiders that these decisions are perhaps being made on less than full, technically valid, open guidelines. Since the original mandate of the FCC was to set proper technical standards, this obligation remains true today.

Respectfully submitted,

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